Feedback Form

Enabling Resources Program (ERP) – Distributed Energy Resources (DER) Integration Project

Meeting Date: November 19, 2025

Feedback Provided by:

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Date: December 3, 2025

Following the **November 19, 2025**, engagement session, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by **December 3, 2025**. If you wish to provide confidential feedback, please submit it as a separate document, marked "**Confidential**." Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

General ERP Feedback

Engagement Process

Topic	Feedback
Feedback on the overall engagement process and approach being utilized for this project	The EDA welcomes the IESO's recognition of LDCs as critical partners in the DER integration process. We appreciate the commitment to ongoing, targeted outreach and engagement with our sector, which is essential to ensuring that the project aligns with the complex operational realities of the distribution grid. We fully support the focus on establishing robust bi-directional data sharing and operational visibility, as these capabilities are foundational for managing reliability across both local and bulk systems. We look forward to collaborating on developing protocols to facilitate the necessary information exchange for effective DER dispatch coordination. The EDA has provided its feedback on the selected questions below.

DER Participation Model

Topic	Feedback
DER participation Do you currently have resources interested in accessing the wholesale markets today? Please specify the resource type (e.g., storage, combined heat and power, etc.) and the MW capacity.	Click or tap here to enter text.
DER aggregation What would be the general characteristics of the DER aggregations you could form to participate in the wholesale markets? Please specify the size, geographic footprint, and resource composition of the aggregation.	Click or tap here to enter text.

Topic	Feedback
Metering requirements If alternative metering requirements for small contributors to an aggregation allow for the use of utility grade revenue meters, would this benefit your business case?	Click or tap here to enter text.

Data Sharing and Coordination

The following questions are of particular interest to DER Aggregators and Local Distribution Companies (LDCs)

Topic	Feedback
Do you foresee any potential impacts from registering additional relevant distribution equipment with the IESO, solely for situational awareness?	The EDA supports the IESO's proposal on data sharing. However, we encourage the IESO to work closely with LDCs to establish the scope of the data sharing requirements, how the data will be used, and the benefits that this additional data will provide in managing the reliability of the IAM. We also note that the additional requirements may impose costs for LDCs (e.g. software). Therefore, the EDA is committed to working with the IESO to ensure that the implementation costs are fair and prudent. **Leverage LDC Expertise:** As was noted at the stakeholder meeting, LDCs possess unmatched expertise and understanding of local grid conditions and customer needs. We encourage the IESO to collaborate with LDCs to determine the required data, minimize unnecessary burden on them, and leverage LDC expertise to ensure that the impacts on the distribution system are adequately considered.
Do you have concerns with authorizing confidential data sharing between the IESO and distributors, if necessary to support system reliability and/or facilitate market participation?	**Conditional Support based on "Need to Know."** It is difficult to provide a definitive endorsement without a precise scope of the specific data to be shared. While LDCs generally support data sharing that demonstrably enhances system reliability, such sharing must be governed by a strict "Need to Know" principle, as new activities introduce additional cybersecurity and privacy risks. Requests should respect privacy statutes, and the liability framework for LDCs should be clearly defined.

Topic	Feedback
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	**Static Data Sharing Considerations:** Cadence of Updates: We reference the stakeholder discussion on the frequency of updates. We agree with the IESO's verbal clarification that updates should be triggered only by "material impacts." We recommend that the IESO work with LDCs to establish a clear and appropriate definition of what constitutes a "material impact" to ensure LDCs are not burdened by administrative requirements for minor changes. Additionally, the IESO should leverage existing T-D protocols, rather than creating new reporting channels. **Bi-directional Operational Visibility:** Notification Mechanism: The proposed mechanism would require "LDCs to provide advanced notice to the IESO when activating DERs for local needs (e.g. NWS program) above a threshold**."** The IESO could consider a threshold of 10MW, which aligns with the existing IESO System Impact Assessment process for DER connections. Alternately, the IESO could consider requiring notifications to be based on their impact on bulk needs and ultimately transition to notifications being part of market bids. The IESO should be mindful that extracting DER data by zone is operationally challenging because of multiple LDCs within each IESO zone. Host vs. Embedded Distributors: Coordination between Host and Embedded LDCs is managed through inter-utility agreements, and parties should be encouraged to collaborate to deliver solutions. **Operational Coordination:** Override Capability: We support the TDWG recommendations regarding the sequencing between DSO and TSO, to ensure local needs are prioritized. It is critical that LDCs retain the right to override market dispatch for local safety and reliability, without imposing a financial penalty on the DER/A.

General Comments/Feedback

Prioritization of Local Needs: We encourage the IESO to clarify how local needs will be prioritized. Consistent with the TDWG T-D Protocols, DERs must be leveraged to resolve local distribution constraints **before** they are cleared for wholesale market participation. The market mechanism must facilitate this sequencing.

Regulatory Alignment and Timeline: The EDA submits that the IESO must ensure that the project is developed **in coordination with the OEB's DSO workstreams** and LDCs. Clarity will be needed to avoid duplication and maintain process efficiency, especially concerning the respective roles of the distributor. Such alignment will ensure that the project supports an efficient evolution of the entire electricity system, enabling these resources to provide both bulk grid services and essential local grid services without creating unintended burdens or conflicts for distribution system operators. The EDA recommends that the IESO synchronize ERP implementation timelines with the OEB's DSO Roadmap and its decisions regarding roles and responsibilities.

Implementation Costs: The EDA supports the IESO's proposal on data sharing, and distributors are committed to facilitating the energy transition; however, as noted above, the new data-sharing requirements (Slides 27-31) may impose implementation costs (e.g., software, communications, and staffing) on LDCs. Therefore, the EDA recommends that the IESO collaborate with LDCs to accurately assess the additional data requirements and costs to ensure that customers receive value for the money spent.

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